# **Privacy Policy**

#### Last Updated: July 16, 2025

At CarShareNova, your privacy is our priority. This Privacy Policy outlines how we collect, use, disclose, and safeguard your personal information when you use our platform for renting and listing luxury and exotic vehicles. By accessing or using CarShareNova, you agree to the practices described in this Privacy Policy.

We may update this Privacy Policy from time to time, and any material changes will be communicated to you. The latest version of this policy will always be accessible on our website, and your continued use of the platform constitutes acceptance of the updated terms.

## **Information We Collect**

#### **Personal Information You Provide**

We collect personal information to provide a smooth and secure experience on CarShareNova. This may include:

- Account Information: Name, email address, phone number, date of birth, and profile photo
- **Identity Verification**: Government-issued ID, driver's license information, and biometric data (see Identity Verification section below)
- Payment Information: Credit card details, billing address, and transaction history
- Vehicle Information: For hosts listing vehicles vehicle registration, insurance details, and vehicle photos
- Communication Data: Messages exchanged through our platform between renters and hosts

#### **Information We Collect Automatically**

When you use the CarShareNova platform, we automatically collect certain information to improve our services:

- Usage Data: Pages viewed, features used, search queries, and interaction patterns
- **Device Information**: IP address, browser type, operating system, device identifiers, and mobile network information
- **Location Data**: GPS data from your device (with your permission) to show nearby vehicles and facilitate pickups
- Log Data: Server logs recording access times, referring URLs, and error reports

# **Cookies and Similar Technologies**

We use cookies and similar technologies to enhance your experience on CarShareNova. Cookies are small data files stored on your device that help us remember your preferences and usage history. You can control the use of cookies through your browser settings, but note that disabling cookies may affect the functionality of our platform.

## **Identity Verification and Biometric Data**

## **SmileID Integration**

CarShareNova uses SmileID, a third-party identity verification service, to verify the identity of users on our platform. This verification process is essential for maintaining the security and trust of our luxury and exotic car sharing community, ensuring that all users are who they claim to be, and complying with regulatory requirements.

## **Biometric Data Collection**

When you use our mobile applications (iOS and Android), we may collect the following biometric data through SmileID:

- Facial images and selfies: Used for identity verification and liveness detection
- Facial geometry data: Extracted features from your face for comparison with government-issued ID documents
- **Document images**: Photos of your driver's license, passport, or other government-issued identification

This biometric data is collected only with your explicit consent when you choose to verify your identity through our apps.

# **Purpose of Biometric Data Collection**

We collect and process biometric data exclusively for the following purposes:

- **Identity Verification**: To confirm that you are the person depicted in your government-issued identification documents
- **Fraud Prevention**: To prevent identity theft and ensure the security of our platform
- **Regulatory Compliance**: To meet Know Your Customer (KYC) and Anti-Money Laundering (AML) requirements
- Platform Security: To maintain a trusted community of verified users for vehicle rentals and listings
- **Age Verification**: To ensure users meet the minimum age requirements for renting luxury and exotic vehicles

#### **How SmileID Processes Your Data**

When you initiate identity verification:

- 1. You will be prompted to take a selfie and photograph your identification document
- 2. These images are securely transmitted to SmileID's servers for processing
- 3. SmileID uses advanced facial recognition technology to compare your selfie with the photo on your ID
- 4. SmileID performs liveness detection to ensure the selfie is of a real person in real-time
- 5. The verification result is returned to CarShareNova
- 6. We store only the verification result and necessary metadata, not the biometric data itself

### **Biometric Data Security and Storage**

- Encryption: All biometric data is encrypted during transmission using industry-standard SSL/TLS protocols
- Limited Access: Access to verification data is strictly limited to authorized personnel on a needto-know basis
- **Secure Storage**: SmileID stores biometric data in secure, encrypted databases compliant with international security standards
- Data Minimization: We collect only the minimum biometric data necessary for identity verification

#### **Biometric Data Retention**

- **Verification Results**: We retain verification results and associated metadata for as long as you maintain an account with CarShareNova and as required by applicable laws
- **Biometric Data**: Raw biometric data (facial images and documents) processed by SmileID is retained according to SmileID's data retention policy, typically for a limited period necessary for verification and compliance purposes
- Deletion Requests: You may request deletion of your verification data by contacting us at <u>info@carsharenova.com</u>

## **Your Rights Regarding Biometric Data**

You have the following rights concerning your biometric data:

- **Consent**: Identity verification using biometric data is voluntary. You may choose not to complete verification, though this may limit your access to certain platform features
- Access: You can request information about what verification data we hold about you
- Correction: You can request corrections to inaccurate verification information
- **Deletion**: You can request deletion of your verification data, subject to legal retention requirements
- Portability: You can request a copy of your verification data in a machine-readable format

• **Opt-out**: You can opt out of biometric verification, though this may affect your ability to rent or list vehicles

### **SmileID Privacy Policy**

For more information about how SmileID handles your data, please review their privacy policy at <a href="https://www.usesmileid.com/privacy-policy">https://www.usesmileid.com/privacy-policy</a>.

#### **How We Use Your Information**

#### **Platform Operations**

We use your personal information to manage the CarShareNova platform, including:

- Creating and managing your account
- Facilitating vehicle rentals and listings
- Processing payments and deposits
- Providing customer support
- Sending transaction confirmations and important platform updates

#### **Service Improvement**

We analyze usage data to understand how users engage with CarShareNova, allowing us to improve platform features, enhance security, and offer personalized services.

## **Marketing and Communications**

With your consent, we may use your contact information to inform you about special offers, promotions, and new services that may be of interest to you. You can opt-out of these communications at any time.

# **Legal Compliance**

We may use your personal information to comply with legal obligations, such as conducting background checks and cooperating with law enforcement when required.

# **Information Sharing and Disclosure**

#### With Other Users

When you engage in a transaction on CarShareNova (e.g., renting a car or listing a vehicle), your contact details, such as your name, phone number, and address, may be shared with the other party to facilitate communication and the completion of the rental.

#### With Service Providers

We may share your personal information with trusted third-party service providers who assist us in operating the platform. These providers include:

- · Payment processors
- · Background check services
- Insurance partners
- Identity verification services (SmileID)
- Marketing and analytics services
- Cloud storage providers

All service providers are required to maintain the confidentiality and security of your information and are prohibited from using your data for their own purposes.

### **Legal Requirements**

We may disclose your personal information if required to do so by law or in response to legal processes, such as court orders or subpoenas, or to protect the rights, property, or safety of CarShareNova, its users, or the public.

#### **Business Transfers**

In the event of a merger, acquisition, or sale of CarShareNova's assets, your personal information may be transferred to the acquiring entity as part of the transaction.

## **Third-Party Data Sharing for Biometric Data**

Your biometric data is shared only with:

- **SmileID**: Our trusted identity verification partner, bound by strict confidentiality and data protection agreements
- Law Enforcement: Only when legally required by valid court orders, subpoenas, or other legal
  processes
- Regulatory Authorities: As required for compliance with applicable laws and regulations

We never sell, rent, or share your biometric data for marketing purposes.

# **Data Security**

We take appropriate technical and organizational measures to protect your personal information against unauthorized access, alteration, disclosure, or destruction. These measures include:

- Encryption of data in transit and at rest
- Regular security assessments and audits
- Access controls and authentication requirements

- Employee training on data protection
- Incident response procedures

However, no system is completely secure, and we cannot guarantee absolute security. You are responsible for maintaining the confidentiality of your account credentials and for any activity conducted under your account.

#### **Data Retention**

We will retain your personal information for as long as necessary to fulfill the purposes outlined in this Privacy Policy or as required by law. Specifically:

- Account Information: Retained for the duration of your account and up to 7 years after closure for legal and compliance purposes
- Transaction Records: Retained for 7 years for tax and regulatory compliance
- **Communications**: Retained for 3 years or as required for dispute resolution
- Marketing Data: Retained until you opt-out or for 2 years of inactivity

Once your data is no longer needed, we will securely delete or anonymize it.

## **Your Rights**

You have the right to:

- Access: Request a copy of the personal information we hold about you
- Correction: Update or correct inaccurate information
- **Deletion**: Request deletion of your personal information (subject to legal requirements)
- Portability: Receive your data in a structured, machine-readable format
- **Restriction**: Limit how we process your information
- Objection: Object to certain processing activities
- Withdraw Consent: Withdraw consent for processing where we rely on consent

To exercise any of these rights, please contact us at <a href="mailto:info@carsharenova.com">info@carsharenova.com</a>. We may require verification of your identity before processing your request.

# **Cookies Policy**

CarShareNova uses cookies to collect information about your usage patterns and preferences.

Cookies help us improve your experience by storing information about your previous interactions with the platform. Types of cookies we use include:

- Essential Cookies: Required for platform functionality
- Analytics Cookies: Help us understand platform usage

• **Preference Cookies**: Remember your settings and choices

• Marketing Cookies: Used to deliver relevant advertisements

You can manage your cookie preferences through your browser settings, but disabling cookies may limit the functionality of the platform. For more detailed information, please review our Cookie Policy.

**Third-Party Links** 

CarShareNova may include links to third-party websites and services. This Privacy Policy does not apply to those websites, and we are not responsible for their privacy practices. We encourage you to review the privacy policies of any third-party sites you visit.

Compliance

Our data collection and processing practices comply with:

General Data Protection Regulation (GDPR)

California Consumer Privacy Act (CCPA)

Biometric Information Privacy Acts (where applicable)

Other relevant data protection and privacy laws

**Changes to This Privacy Policy** 

We may update this Privacy Policy periodically to reflect changes in our data practices or legal obligations. Any changes will be communicated through email or by posting the updated policy on our website. Your continued use of CarShareNova after the changes take effect signifies your acceptance of the updated Privacy Policy.

**Contact Us** 

If you have any questions or concerns regarding this Privacy Policy or our data practices, please contact us:

Email: info@carsharenova.com

Phone: +27 68 615 6178

Address: Gauteng, Johannesburg, 2023, South Africa

For biometric data and identity verification inquiries, please use the subject line "Biometric Data Privacy Inquiry" when emailing us.

We will respond to your inquiry within 30 days.